

TQM

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

RECEIVED

MAY 05 2016  
5-5-16 EAA  
THOMAS G BRUTON  
CLERK, U.S. DISTRICT COURT

Steven Lee Wade

(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

vs.

Case No: 16 C 2362  
(To be supplied by the Clerk of this Court)

Shundala Avery

Andre Fox

Michael AKim star # 78

Sam Larrabee

Carmen Forte

Deborah R. Stanisz

(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")

CHECK ONE ONLY:

AMENDED COMPLAINT

☒ COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983  
U.S. Code (state, county, or municipal defendants)

☐ COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE  
28 SECTION 1331 U.S. Code (federal defendants)

☐ OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

Steven Lee Wade

(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

VS.

Case NO: 16 C 2362

(To be supplied by the clerk of this court)

Shundala Avery

Andre Fox

Michael AKim star # 78

Sam Harrabee

Carmen Forte

Deborah R. Stanis

Patricia Anos

Todd Kleist

Lauretta Froelich

Russ Baker

Carol Kipperman

Robert Ginex

Kathy D. Twine

Althea K. Welsh

Amended Complaint

**I. Plaintiff(s):**

- A. Name: Steven Lee Wade
- B. List all aliases: N/A
- C. Prisoner identification number: R33765
- D. Place of present confinement: Vienna Correctional Facility
- E. Address: 6695 State Route 146 East Vienna, IL 62995

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In **A** below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in **B** and **C**.)

- A. Defendant: Shundala Avery  
Title: Self employed  
Place of Employment: Beauty Shop
- B. Defendant: Andre Fox  
Title: Unknown  
Place of Employment: Unknown
- C. Defendant: Michael Akim Star # 78  
Title: Detective  
Place of Employment: Broadview Police Department

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

**I. Plaintiff(s):**

- A. Name: Steven Lee Wade
- B. List all aliases: N/A
- C. Prisoner identification number: R33765
- D. Place of present confinement: Vienna Correctional Facility
- E. Address: 6695 State Route 146 East Vienna, IL 62995

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In **A** below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in **B** and **C**.)

- A. Defendant: Sam Larrabee  
 Title: State's Attorney / prosecutor  
 Place of Employment: COOK County STATE'S ATTORNEYS OFFICE
- B. Defendant: Carmen Forte  
 Title: State's Attorney / prosecutor  
 Place of Employment: COOK County STATE'S ATTORNEYS OFFICE
- C. Defendant: Deborah R. Stanisz  
 Title: Stenographer  
 Place of Employment: Maybrook Square - Court of Reporters Office

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)



**I. Plaintiff(s):**

- A. Name: Steven Lee Wade
- B. List all aliases: N/A
- C. Prisoner identification number: B33765
- D. Place of present confinement: Vienna Correctional Facility
- E. Address: 6695 State Route 146 East Vienna, IL 62995

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In **A** below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in **B** and **C**.)

- A. Defendant: Patricia Anos  
Title: Supervisor  
Place of Employment: Official Court Reporters of the Circuit Court of Cook County
- B. Defendant: Todd Kleist  
Title: State's Attorney / prosecutor  
Place of Employment: COOK COUNTY STATE'S ATTORNEYS OFFICE
- C. Defendant: Lauretta Froelich  
Title: State's Attorney / prosecutor  
Place of Employment: COOK COUNTY STATE'S ATTORNEYS OFFICE

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

**I. Plaintiff(s):**

- A. Name: Steven Lee Wade
- B. List all aliases: N/A
- C. Prisoner identification number: R33765
- D. Place of present confinement: Vienna Correctional Facility
- E. Address: 6695 State Route 146 East Vienna, IL 62995

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In **A** below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in **B** and **C**.)

- A. Defendant: Russ Baker  
Title: State's Attorney / prosecutor  
Place of Employment: COOK County STATE'S ATTORNEYS OFFICE
- B. Defendant: Carol Kipperman  
Title: Cook County Judge  
Place of Employment: Maybrook Square Courthouse
- C. Defendant: Robert Ginex  
Title: Cook County Judge  
Place of Employment: Maybrook Square Courthouse

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

**I. Plaintiff(s):**

- A. Name: Steven Lee Wade
- B. List all aliases: N/A
- C. Prisoner identification number: R33765
- D. Place of present confinement: Vienna Correctional Facility
- E. Address: 6695 State Route 146 East Vienna, IL 62995

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In **A** below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in **B** and **C**.)

- A. Defendant: Kathy D. Twine  
Title: Executive Director and General Counsel  
Place of Employment: Judicial Inquiry Board
- B. Defendant: Althea K. Welsh  
Title: Senior Counsel  
Place of Employment: Attorney Registration and Disciplinary Commission
- C. Defendant: \_\_\_\_\_  
Title: \_\_\_\_\_  
Place of Employment: \_\_\_\_\_

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

**III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:**

- A. Name of case and docket number: Steven Lee Wade Vs. Cook County  
Department of Corrections, officer Rizzuto, Superintendent Reyes, Sheriff Tom Dart  
14c 3825
- B. Approximate date of filing lawsuit: Uncertain
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: \_\_\_\_\_  
 \_\_\_\_\_  
N/A  
 \_\_\_\_\_
- D. List all defendants: officer Rizzuto, Superintendent Reyes, Sheriff Tom  
Dart, officer Dabrowski  
 \_\_\_\_\_  
 \_\_\_\_\_
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): Northern District of Illinois (Cook County)
- F. Name of judge to whom case was assigned: Honorable Judge Joan  
H. Lefkow
- G. Basic claim made: Failure to protect, inmate assault, and staff  
assault on inmate  
 \_\_\_\_\_  
 \_\_\_\_\_
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): Still pending  
 \_\_\_\_\_  
 \_\_\_\_\_
- I. Approximate date of disposition: Still pending

**IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.**



IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

On 11/20/14, Case # 12CR2167 in the Criminal charge of Home Invasion and multiple others, the State's prosecution entered a Nolle prosequi for the second time (first time 1/20/12) after three years of malicious prosecution while keeping the plaintiff (Steven Lee Wade) detained in the Cook County Jail. The State's prosecution and other State officials participated in fraud, due process violations of the United States Constitution, malicious prosecution, aiding and abetting, fraudulent misrepresentation, gross negligence, and a RICO Conspiracy. Notated below are facts starting with the plaintiff's arrest:

① On December 28<sup>th</sup>, 2011, the plaintiff was arrested by detectives Michael Akim star # 78 and David Yurkovich star # 74 of the Broadview police Department at the Maybrook Square Courthouse. The plaintiff was not committing any crime upon his arrest. The detectives ignored the plaintiff's requests for an explanation, and forcefully took

the plaintiff to the Broadview Police Department. Before being handcuffed, the plaintiff was allowed to give his sister (Shewana Wade) his whitegold chain and silver watch. However, the plaintiff was not allowed to give his sister (Shewana Wade) his cash currency of \$4,400 dollars and two cellphones. In the detective reports it was clearly notated that watches and a chain/necklace was allegedly taken in the alleged Home Invasion dated 12/16/11. This Circumstantial event/evidence is critical in the plaintiff's claim. Detectives Michael Akim star#78 and David Yurkovich star#74 possessed prior knowledge of fact and allegations that they knew were insufficient to make an arrest. On december 23<sup>rd</sup>, 2011, Shundala Avery appeared at the Broadview Police Department alleging to have been victim of a home invasion. Shundala Avery alleged to have been victim of a Home Invasion on december 16<sup>th</sup>, 2011, when she and her husband andre Fox entered their home in broadview, IL that afternoon. Shundala Avery alleged that several masked gunmen ambushed her and andre fox as they arrived to their broadview home after christmas shopping. Former Counsel Francis Ostian and I reviewed one of the initial reports written by the Broadview detectives that was dated 12/18/11, where Shundala Avery stated that she couldn't identify any of the masked suspects, but that her husband later stated to her that it was Steve (plaintiff) (This report has been missing since Ostian's withdrawal)

Detectives Michael Akim star #78 and David Yurkovich star #74 learned and knew that on December 16<sup>th</sup>, 2011, while Andre Fox was at the Loyola Hospital, he gave statements to officer Babicz star #274 of the Maywood Police Department, that he was jogging through an alley in Maywood, Illinois near 2<sup>nd</sup> Avenue, when he was jumped and robbed by three unknown masked assailants/suspects. Andre Fox stated to officer Babicz star #274 that an iPod, Bose Headphones, identification, Invicta Watch, house keys, and grey hooded jacket were taken from him. Review of reports made by detectives Michael Akim star #78 and David Yurkovich star #74 of the Brandon Police Department, details both different and similar items.

② Michael Akim star #78 and David Yurkovich star #74 began their conspiracy by committing document fraud. They backdated their investigation start date by one week and began falsifying other reports to get State's Attorney approval. In support of this claim the plaintiff uses/presents detective Michael Akim's star #78 police report where he notates that on December 20<sup>th</sup>, 2011 he learned of a December 28<sup>th</sup>, 2011 court date (arrest date). There is no mention of my December 22<sup>nd</sup>, 2011, court date scheduled before Judge Carol



Kipperman where I appeared for a hearing. This circumstantial fact supports the plaintiff's claim. After the plaintiff's arrest on december 28<sup>th</sup>, 2011, Michael Akim star # 78 and David Yurkovich star # 74 forged documents to secure felony approval. While detained at the Cook County Jail, the plaintiff's attorney Francis Ostian visited and went over the discovery with the plaintiff. Shundala Avery had statements dated december 18<sup>th</sup>, 19<sup>th</sup>, and the 29<sup>th</sup>. There were fraudulent reports dated december 25<sup>th</sup> and 26<sup>th</sup>, that had my wife (Cumeke Wade), mother-in-law (Brenda King), and father-in-law's (Claude King) names on them. These statements/reports were falsified acknowledgement that they knew of the alleged home invasion and that they banned me from their home. These reports were typed by the Broadview detectives Michael Akim star # 78 and David Yurkovich star # 74 with no signatures from the alleged statement givers. In fact, broadview detectives did not speak with any of the plaintiff's in-laws (Brenda King, Claude King, or Cumeke Wade) until after the plaintiff's arrest on 12/28/11. The falsified reports of the plaintiff's in-laws were removed from the discovery after Francis Ostian's withdrawal and the discovery being given back to the State's attorneys Lauretta Froelich and Russ Baker. Shundala Avery and Andre Fox did not have signed statements until december 29<sup>th</sup>, 2011, one day after



my arrest (Due process violation). Detectives Michael Akim star # 78 and David Yurkovich star # 74 did not send crime scene technicians to Shundala Avery and Andre Fox's Broadview home until one day after my arrest (plaintiff) on december 29<sup>th</sup>, 2011 (Due process violation). Detectives Michael Akim star # 78 and David Yurkovich star # 74 denied the plaintiff his right to prompt presentment before a Judge for probable cause determination by keeping the plaintiff detained at the Broadview Police Department for three days (12/28/11 - 12/31/11) (70 hours). Detectives Michael Akim star # 78 and David Yurkovich star # 74 deliberately failed to submit Shundala Avery's clothing for forensic testing, and deliberately ignored the inconsistencies of both Shundala Avery and Andre Fox statements, along with other evidence. Detectives Michael Akim star # 78 and David Yurkovich star # 74 blatantly disregarded police procedure and conspired with the help of Sam Larrabee the ASA State's Attorney, to pursue a malicious prosecution. Detectives Michael Akim star # 78 and David Yurkovich star # 74 aided and abetted Shundala Avery and Andre Fox in their fraud and malicious prosecution. Detective Michael Akim star # 78 of the Broadview Police Department is liable for aiding and abetting, fraud, Rico Conspiracy, malicious prosecution, and violations of the United States Constitution. Detective Michael Akim star # 78 of the Broadview Police Department was acting under the color of state law.

3

Shundala Avery initiated and instigated this malicious prosecution. Shundala Avery committed Fraud by giving Detectives Michael Akim star #78 and David Yurkovich star #74 false Statements. Shundala Avery committed fraud/perjury by testifying falsely at a Unrelated matter during Sentencing in case #10c440419, that resulted in a ten year enhanced Sentence. In one of the false/alterd reports provided from Detectives Michael Akim star #78 and David Yurkovich star #74 dated december 18<sup>th</sup>, 2011, Shundala Avery allegedly gave to the detectives two Big Bags of alleged evidence, and alleged to have only saw the plaintiff in their home in Broadview on december 16<sup>th</sup>, 2011. In reports provided by the Broadview detectives dated december 19<sup>th</sup>, 2011, Shundala Avery alleged to have both saw and heard the plaintiff in their Broadview home on december 16<sup>th</sup>, 2011. When Shundala Avery was asked by Broadview detectives how her husband who was allegedly beaten, stabbed in the buttocks, and profusely bleeding made it / arrived to the hospital, Shundala Avery stated that she didnt know and that she was on the phone with a locksmith. (Suspicious Account) (phone records were withheld by Russ Baker and Lauretta Froelich). Shundala Avery is liable for fraud, malicious prosecution, aiding and abetting, and a Rico Conspiracy.



(4)

Andre Fox's december 16<sup>th</sup>, 2011 report to Officer Babicz star # 274 of the Maywood Police Department is totally contrary to the december 20<sup>th</sup> and 29<sup>th</sup>, 2011 reports provided by detectives Michael Akim star # 78 and David Yurkovich star # 74 of the Broadview Police Department. Andre Fox committed fraud and a malicious prosecution by aiding and abetting Shundala Avery, and providing false police reports and statements to detectives Michael Akim star # 78 and David Yurkovich star # 74 from the Broadview Police Department, after reporting his december 16<sup>th</sup>, 2011, incident to officer Babicz star # 274 of the Maywood Police Department (Conflicting statements). In Andre Fox's reports to Broadview detectives Michael Akim star # 78 and David Yurkovich star # 74 he stated that he spoke with the plaintiff in his Broadview home on december 16<sup>th</sup>, 2011, but was unable to visually see the plaintiff. Andre Fox also alleged that \$1,200 dollars was taken from him, along with 3 watches and other jewelry (Conflicting account). Andre Fox participated with Detectives Michael Akim star # 78, David Yurkovich star # 74, and State's Attorney Sam Larrabee in their Rico Conspiracy and malicious prosecution. Andre Fox is liable for aiding and abetting, fraud, Rico Conspiracy, and a malicious prosecution.

(5)

ASA Sam Larrabee was the assigned State's Attorney who recklessly approved the criminal charges of Detective Michael Akim star # 78 of the Broadview Police Department in case # 12CR2167 (case # 11400766301) after evidence of fraud, false police reports filed, obstruction of justice, and tampering with evidence. ASA Sam Larrabee failed to properly review the charges and evidence, violated my Constitutional Right to Due Process of law (No warrants / unlawful seizure, ignored police procedure / officer misconduct, etc.), ignored the facts of inconsistencies / fraud, concealed facts, and approved charges without probable cause or evidence. ASA Sam Larrabee is liable for violations of the United States Constitution, gross negligence, fraud, prosecutorial misconduct, malicious prosecution, aiding and abetting, and a RICO conspiracy for approving the criminal charges and assisting the State to accumulate commerce. Sam Larrabee was acting under the color of state law.

(6)

On 12/31/11, at the bond hearing before Judge Carol Kipperman, a female prosecutor (Carmen Forte) read from



Broadview Police Department's Michael Akim star # 78 and David Yurkovich star # 74 detective reports (missing reports). The female prosecutor Carmen Forte read from a report stating that the alleged victim Shundala Avery looked up and noticed the defendant (plaintiff) standing there wearing a black mask. When the defendant (plaintiff) heard this in the courtroom, it immediately grasped his attention! When the defendant (plaintiff) ordered the stenographer's (Deborah R. Stanis) transcript it addressed the prosecutor as MR., was worded differently and deliberately done! The altered version now reads that "through that scarf she was able to identify the defendant at that time" (page # 4 of 12/31/11 transcript). My request for Audio Recordings were denied/ignored by the State's prosecutors and Judges (See: Pro Se Motion For Sanctions For Failure to comply with discovery filed 3/28/14 - but was stamped 3/27/14 page 7 #17, and also Jail mail pro se motion sent in december 2014 - but filed April 9th, 2015 (untimeliness suspicious)). On 12/31/11, throughout that transcript there were several negligent misrepresentations made by the female prosecutor (MR. Carmen Forte), that I believe were in the missing reports written by Broadview detectives Michael Akim star # 78 and David Yurkovich star # 74. On page 3 of the 12/31/11 Bondhearing transcript, the female prosecutor (MR. Carmen Forte) stated that the defendant was found inside a residence located at 2116 South 15<sup>th</sup> avenue in Broadview, the

defendant Kicked one of the victims in the head, and also Stated that the defendant (Plaintiff) stabbed Andre Fox in the rear end. These false statements were stated as facts while in possession and knowledge of contradicting police reports and statements given from Andre Fox to officer Babicz star # 274 of the Maywood Police Department on the date of incident 12/16/11. These false and misstated facts played part in Judge Carol Kipperman's probable cause determination at the Bondhearing (12/31/11), and are notated to have been spoken by a MR. Carmen Forte. The female prosecutor (MR.) Carmen Forte is liable for negligent misrepresentation, fraud, prosecutorial misconduct, malicious prosecution, aiding and abetting, and a Rico Conspiracy. Carmen Forte was acting under the color of State law.

⑦

Deborah R. Stanisiz is the courtroom stenographer who aided and abetted the State's prosecution (MR. Carmen Forte) by changing/altering the Courtroom transcript. Deborah R. Stanisiz heard the open court statements and had Audio Recording to assist in the accuracy of the record. At some point Deborah R. Stanisiz altered

the transcript under the direction of a Colleague or Supervisor, and vowed to its accuracy. Deborah R. Stanisz failed to report whomever ordered the transcript alteration, and became complicit with all parties involved. Deborah R. Stanisz is liable for Gross Negligence, aiding and abetting, fraud, prosecutorial misconduct, malicious prosecution, Rico Conspiracy, and concealment of Rico Conspiracy. Deborah R. Stanisz was acting under the color of state law.

⑧

Patricia Anos is the supervisor of official Court Reporters of the circuit court of cook county, county department, criminal division. Patricia Anos is either complicit or has allowed her subordinate staff to remove courtroom records, including the date of 12/17/13. The 12/17/13 court record is proof of state misconduct that involved Judge Carol Kipperman, Russ Baker (Prosecutor), and prosecutor Loretta Froelich. On 12/17/13, the three state actors began Ex parte Communications that was made manifest, when Judge Carol Kipperman informed the defendant (Plaintiff) as he entered the courtroom, that the state's prosecution was changing its election. (See: transcript 9/3/13 - PROOF OF ELECTION - RUSS BAKER & LORETTA FROELICH)



Patricia Anos's report of compliance is not in compliance.  
The 12/17/13 court record has been removed as an apparent Criminal Cover-up, and further Corroborates this claim. Patricia Anos is liable for Gross Negligence, aiding and abetting, fraud, prosecutorial misconduct, Judicial misconduct, malicious prosecution, Violation of the United States Constitution, Rico Conspiracy, and a Rico conspiracy. Patricia Anos was acting under the color of state law.

(9)

Todd Kleist as a State's Attorney possessed knowledge of fraud by document and major inconsistencies made by Broadview Police Department detectives Michael Akim star # 78 and David Yurkovich star # 74, but still chose to seek an indictment. Todd Kleist failed to report the fraud, Due process Violations, and prosecutorial misconduct (Rules of Professional conduct violations) of his colleagues, and participated in a ongoing RICO Conspiracy. Todd Kleist deliberately and maliciously presented detective Michael Akim Star # 78 as a witness at the Grand Jury instead of the two alleged victims Shundala Avery or Andre Fox (Deceptive Practice). Todd Kleist used his official position to conceal facts that would have



Exonerated the defendant (Plaintiff). Todd Kleist violated the defendant's (Plaintiff's) Right to Due Process of law by deliberately and intentionally misleading the Grand Jury, and applied Coercion so that the indictment was in effect, that of the prosecutor rather than the Grand Jury (See: Grand Jury Indictment 1/19/12). Todd Kleist aided and abetted detective Michael Akim Star #78, MR. Carmen Forte, and was key to the State actors who were involved subsequently. Todd Kleist is liable for aiding and abetting, fraud, prosecutorial misconduct, malicious prosecution, Due process violations of the United States Constitution, Concealment of a Rico Conspiracy, and Rico Conspiracy. Todd Kleist was acting under the color of state law.

(10)

Lauretta Froelich displayed a continual malice towards the plaintiff in several scheduled courtroom appearances (9/3/13, 12/17/13, 3/28/14, 10/16/14, etc.) Lauretta Froelich has withheld discovery after proper discovery request made by the defense (Plaintiff), changed its election, and ignored the defendant's (Plaintiff) repeated attempts to prove/display state misconduct.

The defendant's (Plaintiff's) Constitutional Right to Due Process (speedy trial, etc.) was repeatedly violated by Laurretta Froelich with the help of her colleagues (Court reporters, State's Attorneys, and Judges). Laurretta Froelich displayed a reckless disregard for state law and her Rules of Professional Conduct. Laurretta Froelich failed to report Judicial misconduct done by Carol Kipperman and Robert Ginex to the proper authorities. Laurretta Froelich conspired with other state officials, attempting to secure a guilty plea from the defendant (Plaintiff) on insufficient / dismissed charges (see: Pro Se MOTION FOR SPEEDY TRIAL DISCHARGE and DISMISSAL OF INDICTMENT - filed Oct 16<sup>th</sup>, 2014). Prosecutors Russ Baker and Laurretta Froelich attempted to obtain a criminal conviction in this matter case # 12CR2167 while possessing document knowledge that most of those charges were Nolle Prosequi on January 20<sup>th</sup>, 2012. Laurretta Froelich deliberately delayed the trial process (speedy trial violation), possessed document knowledge of fraudulent police reports written by Broadview Police Department's detectives Michael Akimi star #78 and David Yorkovich star #74, and possessed the power to rectify / remedy these issues, but failed to do so. Russ Baker and Laurretta Froelich withheld Shondala Avery's phone records, criminal background, clothing from the date of alleged incident (12/16/11), and the missing police reports from Broadview Police Department detectives Michael

Akim star #78 and David Yurkovich star #74. All of the missing/ Withheld discovery was favorable to the defendant (Plaintiff). Russ Baker and Lauretta Froelich used perjured testimony of Shundula Avery to enhance my sentence as aggravation in a Unrelated matter (10c440419). The plaintiff was sentenced to ten years in case # 10c440419 as a result of misconduct /retaliation for the defendant's (Plaintiff's) Pro se litigations and Submitted Complaints to the Attorney Registration and Disciplinary Commission and Judicial Inquiry Board. Lauretta Froelich is liable for aiding and abetting, fraud, prosecutorial misconduct, malicious prosecution, violations of the United States Constitution, Judicial misconduct, Rico Conspiracy, and Concealment of a Rico Conspiracy. Lauretta Froelich was acting under the color of state law.

(11)

Russ Baker was complicit in the acts of his colleague /partner Lauretta Froelich, and failed to report her misconduct to the proper authorities (Rules of Professional conduct). Russ Baker stated to Substitute Judge Ramon Ocasio on 9/3/13, that he would look into the defendant's (Plaintiff's) allegations of misconduct, but failed to



do so. Russ Baker participated with Lauretta Froelich and Judge Carol Kipperman in the changing of election (State Misconduct) on 12/17/13. Russ Baker failed to report Judicial misconduct done by both Carol Kipperman and Robert Ginex to the proper authorities. Russ Baker assisted in the obstruction/ withholding of discovery after proper discovery request of the defendant (Plaintiff) and displayed a reckless disregard for his rules of Professional Conduct and State law. Russ Baker is liable for Gross negligence, aiding and abetting, fraud, prosecutorial misconduct, Judicial misconduct, malicious prosecution, Violations of the United States Constitution, RICO Conspiracy, and Concealment of a RICO Conspiracy. Russ Baker was acting under the color of State law.

(12)

Carol Kipperman erroneously/ Complicitly found probable cause at the Bondhearing on 12/31/11, after hearing the fact that the alleged victim Shundala Avery identified the defendant (Plaintiff) while he was wearing a black mask, and the negligent misrepresentations made by the female prosecutor (MR. Carmen Forte). Carol Kipperman was grossly negligent in her duty to uphold the Constitution of the United States when she



erroneously / complicitly found probable cause at the 12/31/11 Bondhearing after hearing and possessing document Knowledge of several due process violations (4<sup>th</sup>, 5<sup>th</sup>, and 14<sup>th</sup> Amendments; No arrest/search warrant, and Improper Identification) Judge Carol Kipperman had prior knowledge of prior prosecutorial misconduct by State prosecutors in a separate matter (case# 10c440419) but failed to act / take corrective measures. Carol Kipperman allowed Broadview Police Department's detective Michael Atkin star#78 and David Yurkovich star#74 to disregard the defendant's (plaintiff's) right to due process, proper police procedure, and submit fraudulent documents. Carol Kipperman continued to allow prosecutorial misconduct in both case# 12CR2167 and (case# 10c440419) and displayed bipartisanship and judicial misconduct in several of the court proceedings. In the missing Court Record date 12/17/13, is proof of deliberate and malicious conduct of the state (State's Attorneys Russ Baker, Lauretta Froelich, and Carol Kipperman changing the election). Carol Kipperman refused to adjudicate issues of misconduct presented by the defendant (plaintiff) and conspired with other state officials to conceal a RICO conspiracy. (See: July 10<sup>th</sup>, 2012 transcript, September 3<sup>rd</sup>, 2013 transcript, and more). Carol Kipperman is liable for gross negligence, judicial misconduct, aiding and abetting, fraud, prosecutorial misconduct, malicious prosecution, violations of the United States Constitution, RICO conspiracy, and concealment of a RICO conspiracy. Carol Kipperman was acting under the color of state law.

(13)

Robert Ginex was assigned cases #12CR2167 and (case #10C440419), Sometime between my last Court date with Judge Carol Kipperman on 12/17/13, and my Court ordered Continuance of 2/5/14 where I met Judge Robert Ginex for the first time. On 2/5/14, I informed Judge Robert Ginex of the various issues of State misconduct by the Court and prosecution (change of election 12/17/13, missing officer testimony in case 10C440419, prosecutor's Russ Baker and Lauretta Froelich withholding discovery, Continuances made "not by agreement", etc.), but was ignored along with Robert Ginex minimizing all of my allegations. Judge Robert Ginex failed to remain a neutral party, failed to adjudicate impartially (Judicial misconduct), and failed in his appointed duty to uphold the Constitution of the United States. On 3/28/14, I filed my pro se Motion For Sanctions For Failure To Comply With Discovery. I was not given a file stamped copy of that motion as I requested on that date. Instead, Robert Ginex, Russ Baker and Lauretta Froelich imposed a plea offer and set a date for me to consider. After I declined the state's offer on 4/16/14, I renewed my request for my filed stamped copies of my previous submitted motions. I believe Robert Ginex was going to discard my pro se motion for sanctions filed 3/28/14, but was forced to file stamp it himself, seeing that he was in possession of that motion, and not



the clerk of the court (See: Judicial Inquiry Board complaint letter dated 4/22/14). Robert Ginex even tried to force me into a Bench trial (abuse of power) by offering a bench trial that could've been scheduled in a few weeks versus the four month alleged wait for a Jury trial. Robert Ginex displayed his partiality throughout the scheduled court proceedings before him and deliberately went beyond his authorized capacity (see: MOTION FOR SUBSTITUTION OF JUDGE FOR CAUSE filed Sep 16<sup>th</sup>, 2014 and court transcript 11/20/14) Robert Ginex tried to act as if the motion for substitution of Judge for cause, did not have an attached affidavit. Therefore, trying to manipulate the system and state law. Prosecutors Russ Baker and Lauretta Froelich were complicit as they remained quiet, even after my request to them to inform Robert Ginex that the State's prosecution's copy of that motion had an attached affidavit. Robert Ginex clearly knew what he was doing, and is liable for gross negligence, aiding and abetting, judicial misconduct, fraud, prosecutorial misconduct, malicious prosecution, violations of the United States Constitution, Rico Conspiracy, and concealment of a Rico Conspiracy. Robert Ginex was acting under the color of state law.

(14)

Kathy D. Twine of the Judicial Inquiry Board

responded to the defendant's (Plaintiff's) complaints and failed to properly address the violations of Due process of law and misconduct done to the plaintiff by Court Judge Carol Kipperman and Robert Ginex. I submitted several complaints to the Judicial Inquiry Board (Kathy D. Twine) about Judge Carol Kipperman before my cases (10C440419 and 12CR2167) were reassigned to Judge Robert Ginex. Judge Carol Kipperman had already made erroneous rulings in defendant's (Plaintiff's) pretrial motions, failed to investigate/adjudicate issues of State misconduct, and allowed the prosecution to change their election again on 12/17/13 (missing transcript!) Kathy D. Twine allowed Judge Robert Ginex to continue where Carol Kipperman left off. Robert Ginex was allowed to make erroneous rulings during Court proceedings even after the defendant's (Plaintiff's) continued complaints, and mailing of two different copies of void/defective charging instruments (offer of proof) to the Judicial Inquiry Board. I was instructed by Kathy D. Twine by letter correspondence, to address the Court (Robert Ginex) who was an apparent conspirator. Leaving me to the continued misconduct of those who were abusing their official authority and perverting justice! Kathy D. Twine is liable for gross negligence, judicial misconduct, malicious prosecution, Rico conspiracy, concealment of a Rico conspiracy, and fraud by its subordinates. Kathy D. Twine



Was acting under the color of state law.

(15)

I Submitted Several Complaints to the Attorney Registration and Disciplinary Commission about the misconduct of State prosecutors Russ Baker and Lauretta Froelich. The defendant's (Plaintiff's) Complaints were answered by Althea K. Welsh, who never properly addressed / resolved the continued violations of Professional Conduct. I was continually subjected to misconduct by State prosecutors Lauretta Froelich and Russ Baker without remedy from the Attorney Registration and Disciplinary Commission. I informed the (A.R.D.C.) through complaint, that the Court was also participating in misconduct, and was still instructed by Althea K. Welsh (A.R.D.C.) to address the court who was an alleged Rico Conspirator. I produced evidence / proof of state misconduct when I sent copies of two different charging instruments that were both void / defective, to the Attorney Registration and Disciplinary Commission by certified mail. Althea K. Welsh failed to render ethically mandated assistance. Althea K. Welsh is liable for gross negligence, fraud, prosecutorial misconduct, malicious prosecution, and a Rico conspiracy. Althea K. Welsh was acting under the color of state law.

**V. Relief:**

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

The plaintiff is suing each defendant in both their individual capacity and official capacity. The plaintiff seeks a favorable judgement from the court by awarding him financial compensation for the extensive and irreparable damages caused by the defendants. The plaintiff prays that the court will award him 1.5 million dollars from each of the defendants, totalling to 2.1 million dollars.

VI. The plaintiff demands that the case be tried by a jury. ☐ YES ☐ NO

**CERTIFICATION**

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 2<sup>nd</sup> day of May, 20 16

Steven Wade  
(Signature of plaintiff or plaintiffs)

Steven Wade  
(Print name)

R33765  
(I.D. Number)

6695 State Route 146 East  
Vienna, Illinois 62995  
(Address)